

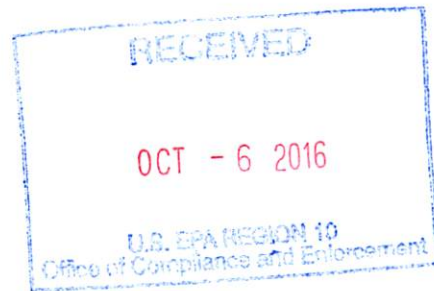
Confidential Business Information

EPA Region 10
Deemed Releasable

Shell Oil Products US
8505 South Texas Road (Deliveries)
P.O. Box 622 Anacortes, WA 98221-0622
Tel: 1 360 293 0800
Fax: 1 360 293 0808

October 4, 2016

Javier Morales
U.S. EPA, Region 10
1200 Sixth Avenue, Suite 900, OCE-101
Seattle, Washington 98101



Re: Request for Information Regarding the Facility located at 8505 South Texas Road, Anacortes, WA.

Dear Mr. Morales,

This letter and the attached documents are being provided by Shell Oil Products Puget Sound Refinery (the "Company") in response to your Request for Information Regarding the Facility located at 8505 South Texas Road, Anacortes, WA received on August 8, 2016. The Company understands this request was to obtain further information subsequent to the U.S. Environmental Protection Agency ("EPA") Risk Management Program ("RMP") inspection that was conducted the week of August 10, 2015. Please find the Company's responses to your requests below and the attached relevant documentation with a Statement of Certification having been signed by a duly authorized officer.

Please note that certain information that Shell is providing constitutes confidential trade secrets and commercial or financial information ("Confidential Business Information" or "CBI") exempted from public disclosure under 5 U.S.C. § 552(b)(4) and subject to a claim of confidentiality under 40 C.F.R. § 2.208. Confidential business information gathered under the authority of Section 114 of the Clean Air Act is subject to 40 CFR § 2.301 and appropriate steps should be taken to properly safeguard the information. 40 C.F.R. § 2.211. We have marked specific documents as CBI where appropriate. Please treat these documents and the information they contain as confidential, as provided by the Freedom of Information Act or equivalent state law.

Supplemental request 1: Define the process boundaries of the flare gas recovery (FGR) system in relation to the East, South, and North Flare System. Provide supporting documentation.

Response:

The Company previously provided information related to this request in response to Request 8 on February 3, 2016, Bates-labeled PSR06870. The Company is providing a flare isometric drawing which shows the FGR in relation to the East, South, and North Flare System in Bates-labeled PSR07017. The provided drawing shows the FGR connection to the flare systems.

Supplemental request 2: Explain how the maximum intended inventory of the flammable mixture was calculated for the FGR system. Provide supporting documentation, including the maximum intended inventory calculations.

Response:

The Company previously provided information relating to this request in response to Request 38 on August 26, 2015, Bates-labeled PSR06212 and PSR06249, stating that no maximum intended inventories were calculated for the Flare Systems because the systems are not considered to be covered under EPA's Risk Management Program. Materials routinely in the Flare Gas Recovery system are included in the response to Supplemental Request #3 below. Any additional non-routine material would be the result of a unit upset. In the event of an upset, any inventory in the flare gas recovery system would have been accounted for in other units.

Supplemental request 3: Describe the composition of chemicals in the flammable mixture by weight percent for the FGR system. Provide supporting documentation.

Response:

Materials routinely in the FGR System include a few pressure controllers and degassing drums, primarily consisting of methane, ethane, and propane. The Company is providing the composition breakdown in Bates-labeled PSR07018 through PSR07037. An exception to the chemical composition would occur during a unit upset, which is not routine. During an upset the composition would depend on the type of the upset and the unit involved, and is therefore not known. The chemical composition of the upset will be accounted for in the respective process unit.

Supplemental request 4: Describe the operating pressures and temperatures of the process equipment and piping circuits for FGR system. Provide supporting documentation.

Response:

In response to this request, the Company is providing documentation showing normal operating temperatures and pressures for the FGR system based on sample data. This data is included in Supplemental Response 3.

Supplemental request 5: Describe and list the process equipment and piping circuits for the FGR system including the dimensions and volume of the process vessels and piping circuits. For each process vessel, indicate if it is oriented horizontally or vertically. Provide supporting documentation.

Response:

In response to this request the process equipment and piping circuits for the FGR System are as shown in the response to Supplemental Request 3 below. The Company is providing supporting isometric drawings of interconnecting piping as well as vessel dimension specification sheets for the FGR Systems in Bates-labeled PSR07038 through PSR07181. Additionally, volume calculations for FGR System vessels are provided in PSR07182.

Supplemental request 6: Provide accurate and up-to-date piping and instrumentation diagrams (P&IDs) for the FGR system as provided in 40 C.F.R. 68.65(d). If existing P&IDs do not represent a current configuration or rate, so state and provide current configurations and rates where appropriate.

Response:

In response to this request, the Company is providing current piping and instrumentation diagrams (P&IDs) for the FGR System in Bates-labeled PSR07183 through PSR07192.

If you have any questions regarding this information, please contact Shirley Yap, General Manager, Puget Sound Refinery at 1 (360) 293-0819.

Sincerely,



Shirley Yap
GM, Puget Sound Refinery

Enclosure 3

Puget Sound Refinery
Shell Oil Products U.S.
P.O. Box 62
Anacortes, WA 98221

INFORMATION REQUEST
STATEMENT OF CERTIFICATION

I certify that the enclosed responses to EPA's Information Request issued to Puget Sound Refinery, Shell Oil Products U.S. are true, accurate, and complete. I certify that the portions of these responses which I did not personally prepare were prepared by persons acting on behalf of Puget Sound Refinery, Shell Oil Products U.S. under my supervision and at my instruction, and that the information provided is true, accurate, and complete. I am aware that there are significant penalties for submitting false information in response to this Information Request, including the possibility of fine and imprisonment.



Signature

Shirley Yap

Printed Name

General Manager, Shell Puget Sound Refinery

Title

Oct 4, 2016

Date